

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	15-33997
Jabbar Goodson	)		
Debtor	)	Chapter:	Chapter 13
	)		
	)	Judge:	LaShonda A. Hunt

NOTICE OF MOTION

To: Jabbar Goodson, 4042 216th St. Apt 1E, Matteson, IL, 60443

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **June 17, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **LaShonda A. Hunt** at 219 S. Dearborn St. # 719, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 5/23/2019.

By: /s/Dale Riley  
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

Central Park Apartments

12304 Baltimore Ave  
Ste E  
Beltsville MD 20705

Fair Collections & Outsourcing  
Bankruptcy Dept.  
12304 Baltimore Ave., Ste. E  
Beltsville MD 20705

City of Chicago Bureau Parking  
Department of Revenue  
PO Box 88292  
Chicago IL 60680

Arnold Scott Harris PC  
Bankruptcy Dept.  
111 W. Jackson Blvd., Ste. 600  
Chicago IL 60604

Secretary of State  
Bankruptcy Dept.  
2701 S. Dirksen Pkwy.  
Springfield IL 62723

DEPT OF EDUCATION/NELN  
Attn: Bankruptcy Dept.  
121 S 13Th St  
Lincoln NE 68508

IDES  
Bankruptcy Department  
33 S. State Street  
8th Floor  
Chicago IL 60603

Andrew Dryjanksi  
Assistant Attorney General  
33 S State St #992  
Chicago IL 60603

Illinois State Toll Hwy Auth  
Attn: Legal Dept - Bob Lane  
2700 Ogden Ave.  
Downers Grove IL 60515-1703

Linebarger Goggan Blair &  
Bankruptcy Dept.  
PO Box 06152  
Chicago IL 60606-0152

IRS Priority Debt  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia PA 19101

Springleaf Financial S  
Attn: Bankruptcy Dept.  
9632 S Cicero Ave  
Oak Lawn IL 60453

Village of Matteson  
Bankruptcy Department  
4900 Village Commons  
Matteson IL 60443

Municipal Coll. of America  
Bankruptcy Dept.  
3348 Ridge Rd.  
Lansing IL 60438

Linebarger Goggan Blair &  
Bankruptcy Dept.  
PO Box 06152  
Chicago IL 60606-0152

Village of Park Forest  
Attn: Bankruptcy Dept.  
350 Victory Dr.  
Park Forest IL 60466

Municipal Coll. of America  
Bankruptcy Dept.  
3348 Ridge Rd.  
Lansing IL 60438

Village of Richton Park  
Attn: Bankruptcy Dept.  
4455 Sauk Trail  
Richton Park IL 60471

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>  <b>Jabbar Goodson</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 15-33997</b>  <b>Chapter: Chapter 13</b>  <b>Judge: LaShonda A. Hunt</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Mr. Jabbar Goodson (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 10/06/2015.
3. The Debtor’s plan was confirmed by the Court on 02/03/2016.
4. The Debtor fell behind on his Chapter 13 plan payments because he was off work to care for his mother who was ill.
5. The Debtor has returned to work and is able to resume plan payments, however he is unable to cure the default.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to defer the arrears to the end of the plan term.

Court enter an order:

1. Deferring arrears to the end of the plan term,
2. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960